

Eric Honig (CSBN 140765)  
LAW OFFICE OF ERIC HONIG  
A Professional Law Corporation  
P.O. Box 10327  
Marina del Rey, CA 90295  
erichonig@aol.com  
Telephone: (310) 699-8051  
Fax: (310) 943-2220

Attorney for Claimant  
Nicholas Beugg

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

\$599,600.00 IN U.S. CURRENCY,

Defendants,

NICHOLAS BEUGG,

Claimant.

No. 2:19-CV-0088-JLS (AFMx)

STIPULATION TO STAY ACTION;  
PROPOSED ORDER THEREON  
LODGED CONCURRENTLY  
HEREWITH

WHEREAS, 18 U.S.C. §981(g) provides for a mandatory stay 1) if civil discovery will adversely affect the ability of the government to conduct a related criminal investigation or the prosecution of a related criminal case, or 2) if the claimant is the subject of a related criminal investigation, the claimant has standing to assert a claim in the civil forfeiture proceeding, and continuation of the forfeiture proceeding will burden the right of the claimant against self-incrimination in the related investigation or case; and

WHEREAS, the plaintiff United States government and the Claimant

Nicholas Beugg agree that grounds for a stay of the instant civil forfeiture proceeding exist pursuant to 18 U.S.C. §981(g) because of an ongoing related criminal investigation;

NOW and THEREFORE, and subject to the approval of the Court, the parties hereby agree and stipulate that:

1. This civil forfeiture proceeding shall be stayed pending completion of the government's related criminal investigation and any related criminal case initiated thereafter;

2. All outstanding discovery requests are hereby withdrawn;

3. The parties shall not file any pleadings with the Court during the pendency of the stay, except that the government, as of the date this Order is entered, shall file status reports with the Court every 90 days informing the Court of the status of its criminal investigation;

4. Upon completion of its related criminal investigation, and any related criminal case initiated thereafter, the government shall file a notice with the Court requesting that the stay be lifted; and

5. Upon the filing of the above notice by the government, the parties request the Court to enter an order lifting the stay, so that the case may proceed.

6. Upon entry of the order lifting of the stay, Claimant shall file his response to the Complaint within 20 days thereafter, unless that time is extended by agreement of the parties pursuant to Local Rule 8-3 or otherwise by order of the Court.

DATED: May 15, 2019

Respectfully submitted,

LAW OFFICE OF ERIC HONIG

/s/ Eric Honig

ERIC HONIG  
Attorney for Claimant Nicholas Beugg

1 DATED: May 15, 2019

2 NICOLA T. HANNA  
3 United States Attorney  
4 LAWRENCE S. MIDDLETON  
5 Assistant United States Attorney  
6 Chief, Criminal Division  
7 STEVEN R. WELK  
8 Assistant United States Attorney  
9 Chief, Asset Forfeiture Section

10 /s/ Brent A. Whittlesey

11 **BRENT A. WHITTLESEY**  
12 Assistant United States Attorney  
13 Asset Forfeiture Section  
14 *[per e-mail authorization granted 5/15/19]*  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Eric Honig (CSBN 140765)  
LAW OFFICE OF ERIC HONIG  
A Professional Law Corporation  
P.O. Box 10327  
Marina del Rey, CA 90295  
erichonig@aol.com  
Telephone: (310) 699-8051  
Fax: (310) 943-2220

Attorney for Claimant  
Nicholas Beugg

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,	)	No. 2:19-CV-0088-JLS (AFMx)
Plaintiff,	)	
vs.	)	[PROPOSED]
\$599,600.00 IN U.S. CURRENCY,	)	ORDER STAYING ACTION
Defendants,	)	
_____		
NICHOLAS BEUGG,	)	
Claimant.	)	
_____		

Considering the parties stipulation requesting a stay of the instant civil forfeiture proceeding pursuant to 18 U.S.C. §981(g),

IT IS ORDERED THAT:

1. The Court finds that grounds for a stay of the instant civil forfeiture proceeding exist pursuant to 18 U.S.C. §981(g) because of a related criminal investigation;
2. This civil forfeiture proceeding shall be stayed pending completion of the government's related criminal investigation;
3. All outstanding discovery requests are hereby withdrawn;

1           4.     The parties shall not file any pleadings with the Court during the  
2 pendency of the stay, except that the government, as of the date this Order is  
3 entered, shall file status reports with the Court every 90 days informing the Court  
4 of the status of its criminal investigation; and

5           5.     Upon the filing of the above notice by the government, the Court shall  
6 enter an order lifting the stay, so that the case may proceed.

7  
8 DATED: \_\_\_\_\_

UNITED STATES DISTRICT JUDGE \_\_\_\_\_